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5 Susan Kiely Krauss

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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10

11 SUSAN KIELY KRAUSS, an individual

12 Plaintiff,

13 vs.

14 VOLKSWAGEN OF AMERICA, INC., a  
15 Delaware Corporation,

16 Defendant.  
17

CASE NO. C04-02989 PJH

**STIPULATION AND [~~PROPOSED~~] ORDER  
TO CONTINUE CASE MANAGEMENT  
CONFERENCE**

1 Plaintiff Susan Kiely Krauss ("Plaintiff") and defendant Volkswagen of America,  
2 Inc. ("Defendant"), through their respective counsel, hereby stipulate to continue the Case  
3 Management Conference, currently scheduled for December 15, 2005, as follows:  
4

5 **STIPULATION**

6 IT IS HEREBY STIPULATED by, between and among Plaintiff, on the one hand, and the  
7 Defendant, on the other hand, through their respective attorneys, as follows:

8 WHEREAS a Case Management Conference is currently calendared for December 15,  
9 2005;

10 WHEREAS the Parties reached a written settlement that requires the parties to  
11 performed certain obligations between January 1, 2006 and January 15, 2006, and postponement of  
12 the aforementioned conference will allow the Parties time to fully perform their respective  
13 obligations under the settlement agreement and then file a Stipulation for Dismissal of this action;

14 WHEREAS good cause exists for the requested order because allowing time for the  
15 parties to complete the settlement and dismiss this action will save the parties time, effort, and  
16 expense, and will further conserve judicial resources;

17 NOW THEREFORE it is stipulated by and between the Parties, through their  
18 respective counsel of record, as follows:

19 The Case Management Conference shall be continued from December 15, 2005 to February  
20 2, 2006, or as soon thereafter as is convenient for the Court.  
21

22 IT IS SO STIPULATED.

23 DATED: December 9, 2005

JEFFER, MANGELS, BUTLER & MARMARO LLP  
R. SCOTT BRINK  
BARBRA A ARNOLD

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25  
26 BY: \_\_\_\_\_/S/  
BARBRA ARNOLD  
27 ATTORNEYS FOR DEFENDANT VOLKSWAGEN  
OF AMERICA, INC.  
28 \_\_\_\_\_

1 DATED: December 9, 2005

O'KEEFE & O'KEEFE LLP  
GARET D. O'KEEFE


2  
3 BY: \_\_\_\_\_/S/  
4 GARET D. O'KEEFE  
5 ATTORNEYS FOR PLAINTIFF SUSAN KIELY  
6 KRAUSS  
7

8 **[PROPOSED] ORDER**

9 Good cause having been shown by the foregoing Stipulation of the parties,  
10 IT IS HEREBY ORDERED that the Case Management Conference be continued from December  
11 15, 2005 to February 2, 2006.  
12

13  
14 **IT IS SO ORDERED.**

15  
16 Dated: 12/13/05

  
\_\_\_\_\_  
Honorable Phyllis J. Hamilton  
UNITED STATES DISTRICT COURT JUDGE

18 **LAST CONTINUANCE!**  
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**ATTESTATION**

I hereby attest that the content of this document is acceptable to all persons required to sign the document, and that I have on file all required holograph signatures for any signatures indicated by a "conformed" signature within this efiled document.

/s/  
Garet D. O'Keefe